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Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

Kush, Inc., a Nevada corporation,

Plaintiff,

v.

Frank Van Vranken, an individual; DOES I-
X, inclusive, and ROE Corporations I-X,
inclusive,

Defendants.

Case No. 2:20-cv-00647-APG-NJK

**STIPULATED MOTION
TO CONTINUE DEADLINE
TO FILE RESPONSE TO
PLAINTIFF'S MOTION FOR
DECLARATORY RELIEF**

(Assigned to the Honorable
Andrew P. Gordon)

Defendant Frank Van Vranken, Sr. ("Defendant"), by and through undersigned counsel, and Plaintiff Kush, Inc. ("Plaintiff"), by and through undersigned counsel, hereby submit their stipulated motion to continue Defendant's deadline to file his response to Kush's motion for declaratory relief to September 11, 2020. This deadline is currently set for September 8, 2020. Defendant will be referencing the transcript of the parties' May 28, 2020

1 oral argument in his response. However, Defendant was unable to obtain a copy of the
2 transcript until late Wednesday, September 2, 2020 because the assigned court reporter was
3 out-of-the-office.
4

5 Accordingly, the parties stipulate specifically that:

6 1. The deadline to file a response to Kush's motion for declaratory relief,
7 presently set on September 8, 2020, shall be extended to September 11, 2020 after the Court
8 enters a ruling.
9


10
11 **IT IS SO ORDERED:**

12 
13 _____
14 Honorable Andrew P. Gordon


15 DATED: September 9, 2020

16 RESPECTFULLY SUBMITTED this 8th day of September, 2020.

17 **THE LAW OFFICE OF MICHAEL W. McKELLEB, ESQ. PLLC**

18
19 By: 
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By: Kenneth Hogan (w/permission)
Kenneth Hogan, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2020, I electronically transmitted the foregoing Stipulated Motion to Continue Deadline to File Response to Plaintiff's Motion for Declaratory Relief using the CM/ECF System for filing, and that I transmitted a Notice of Electronic Filing to the following CM/ECF registrants:

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By: christina rakovits